

JONES DAY

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January 27, 2022

VIA ECF

The Honorable Colleen McMahon
U.S. District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Mogul v. New York Public Radio et al.*,
Case No. 1:21-CV-5882 [rel. 1:21-cv-04972-CM-RWL]

Dear Judge McMahon:

We represent Defendants New York Public Radio and Audrey Cooper in the above-referenced matter, and write on behalf of all parties in this case. To allow time for continued settlement discussions, the parties request that the Court extend the deadline for the parties to exchange initial disclosures from January 28, 2022 to February 11, 2022.

The parties continue to engage in productive settlement discussions, but their progress towards resolution has been delayed by COVID-19-related events and resultant changes to travel plans. The parties, however, remain hopeful that they will be able to resolve this matter.

This is Defendants' fifth request for an extension. The Court granted Defendants' two previous requests for extensions of time to file a responsive pleading (*see* ECF Nos. 11, 21) as well as their December 5, 2021 and January 5, 2022 requests to extend the parties' deadline to exchange initial disclosures (*see* ECF Nos. 29, 34). This is Plaintiff's third extension request, as Plaintiff joined in Defendants' December 5, 2021 and January 5, 2022 requests to extend the parties' deadline to exchange initial disclosures. (*Id.*) The parties' requested extension will not affect any other scheduled dates.

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Respectfully submitted,

/s/ Wendy C. Butler

Wendy C. Butler

cc: Cynthia Rollings
Luna Droubi
Rebecca Pattiz